

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' EIGHTY-SIXTH (NON-SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN
SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

Upon the eighty-sixth omnibus objection (the "Objection")² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors"), for entry of an order (this "Order") sustaining the Objection and disallowing and expunging in their entirety the Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
5. To the extent a response is filed regarding any Superseded Claim, each such Superseded Claim, and the Objection as it pertains to such Superseded Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order

will be deemed a separate order with respect to each Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtor may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

SCHEDULE 1

Superseded Claims

FTX Trading Ltd. 22-11068 (JTD)
Eighty Sixth Omnibus Claims Objection
Schedule 1 - Superfeded Claims

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
2210	Name on file	FTX Trading Ltd.	USD	6,416.5100000000000000	4708	Name on file	FTX Trading Ltd.		
								AAVE-20210326	0.0000000000000000
								ALGO-20190927	0.0000000000000000
								APR-PERP	0.0000000000000000
								BNB-20200626	0.0000000000000000
								BNB-20200925	0.0000000000000000
								BNV-20200327	0.0000000000000000
								BTC	0.0000000000000000
								BVOL	0.0000000000000000
								COMP	0.0000000000000000
								DOT-20210326	0.0000000000000000
								ETC-20200327	0.0000000000000000
								ETHW	0.0000000000000000
								FTT	0.0000000000000000
								LUNA2	0.0012566296460000
								LUNA2_LOCKED	0.0029512135840000
								PERP-PERP	0.0000000000000000
								SHIT-20200626	0.0000000000000000
								SRM-PERP	-0.0000000000000000
								SRM	15.3014169800000000
								SRM_LOCKED	12.225.60723208000000
								STETH	0.0000000000000000
								USD	1,270.2451424956052835
								USDT	0.000000015484496
								USDC	0.1778820000000000
								WBTC	0.0000000075000000
								XRP-20210326	0.0000000000000000
2200	Name on file	FTX Trading Ltd.	USD	25,421.7100000000000000	2321	Name on file	FTX Trading Ltd.	USD	25,421.7100000000000000
2207	Name on file	FTX Trading Ltd.	USD	99,620.4600000000000000	47113	Name on file	FTX Trading Ltd.		
								APR-PERP	0.0000000000000000
								ETH	0.0740000000000000
								FTT	0.0818981100000000
								LUNA2	0.0006456226050000
								LUNA2_LOCKED	0.0015506452750000
								PERP-PERP	0.0000000000000000
								SOL	0.0021384400000000
								SOL-PERP	0.0000000000000000
								SRM	88.6775096000000000
								SRM_LOCKED	2,363.68269040000000
								USD	98,490.21048119380000
								USDC	0.0940720000000000
84985	Name on file	FTX Trading Ltd.		0.00000000172000	84986	Name on file	FTX Trading Ltd.		0.00000000172000
				0.000000007217002				AAVE	0.000000007217002
				0.0000000000000000				BNB-PERP	0.0000000000000000
				0.1000000008617764				BTC	0.1000000008617764
				0.0000000000000000				BTC-PERP	0.0000000000000000
				0.000000001864150				BULL	0.000000001864150
				0.000000001400000				BVOL	0.000000001400000
				0.0000000000000000				DOT-PERP	0.0000000000000000
				0.0000000010000000				ETH	0.0000000010000000
				0.000000001213500				ETHBULL	0.000000001213500
				0.0000000000000000				ETH-PERP	0.0000000000000000
				0.000000004654668				FTT	0.000000004654668
				0.0000000000000000				LINK	0.0000000000000000
				0.000000000955000				LINERBULL	0.000000000955000
				0.0000000000000000				LTCBULL	0.0000000000000000
				36.400488300000000				LUNA2	36.400488300000000
				84.914386000000000				LUNA2_LOCKED	84.914386000000000
				117.260000000000000				LUNC	117.260000000000000
				0.0000000000000000				SOL	0.0000000000000000
				0.041136960000000				SRM	0.041136960000000
				23.763456090000000				SRM_LOCKED	23.763456090000000
				0.0000000000000000				SUSHI	0.0000000000000000
				48,901.60194007502000				USD	48,901.60194007502000
				0.0000000000000000				XRPBEAR	0.0000000000000000
				0.000000006950000				XRPBULL	0.000000006950000
				0.000000003550000				YFI	0.000000003550000
				0.000000003925000				ZECBULL	0.000000003925000
5881	Name on file	FTX Trading Ltd.	USD	25,000.0000000000000000	79995	Name on file	West Realm Shires Services Inc.	USD	25,000.0000000000000000
980	Name on file	FTX Trading Ltd.	USD	16,542.0000000000000000	8232	Name on file	FTX Trading Ltd.		13.4800000000000000
								SRM_LOCKED	68.6150000000000000
								TRX	20.0000000000000000
								USD	10,808.917750561772000
								USDT	5,600.4700000000000000